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JOHN J. COTA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN J. COTA,
and
FLEET MANAGEMENT, INC.

Defendant.

Case No. CR 08-0160 SI

**[Proposed] PROTECTIVE ORDER
GOVERNING DISCOVERY MATERIAL**

This matter coming before the Court pursuant to Defendant John J. Cota's ("Captain Cota") Status Conference Statement, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED THAT:

With respect to any records produced in discovery by the United States pertaining to defendant John Cota:

1. Any materials provided by the government to defendant Fleet Management, Inc. containing any unredacted Personal Identity Information (PII relating to defendant John Cota

1.

1 including date of birth, social security number, home address, telephone numbers and any
2 documents or other materials pertaining to defendant John Cota's medical history ("Medical
3 History Materials"), and personal or licensing matters ("Licensing Materials") shall be for
4 attorney's eyes only, and shall not be disclosed to anyone working with defense counsel on this
5 criminal case absent a further Order of this Court.

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7 2. Intentional violation of this Order shall be punishable as a contempt, and may
8 result in the imposition of civil and criminal sanctions.

9 It is so Ordered.

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13 _____
14 Honorable Susan Illston
United States District Court Judge

15 Dated: _____, 2008
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PROOF OF SERVICE

I am employed in the County of San Francisco, State of California by a member of the Bar of this Court, at whose direction this service was made. I am over the age of 18 and not a party to the within action. My business address is 55 Second Street, Suite 1700, San Francisco, CA 94105. On August 18, 2008, I served the document(s) described as:

[Proposed] PROTECTIVE ORDER GOVERNING DISCOVERY MATERIAL
on the parties to this action named on the attached service list by the method described below.

(BY PERSONAL SERVICE) I caused a true and correct copy of said document(s) to be served by hand to the addressee(s) listed above, with the name and address of the person served shown on the envelope.

(BY OVERNIGHT DELIVERY) I enclosed a true and correct copy of said document(s) in an envelope/package provided by an overnight delivery carrier addressed to the addressee(s) listed above, sealed it, and placed it for collection and overnight delivery following the ordinary business practices of Kirkpatrick & Lockhart Preston Gates Ellis LLP. I am readily familiar with the firm's practice of collecting and processing correspondence for overnight delivery. On the same day that correspondence is placed for collection and overnight delivery, it is collected by an overnight delivery carrier. Delivery fees are pre-paid or provided for in accordance with the ordinary business practices of Kirkpatrick & Lockhart Preston Gates Ellis LLP.

X (BY ELECTRONIC TRANSMISSION) I transmitted a true and correct copy of said document(s) by electronic mail to the offices of the addressee(s). I did not receive, within a reasonable time after the transmission, any message or other indication that the transmission was unsuccessful.

(BY FACSIMILE) I transmitted a true and correct copy of said document(s) by facsimile to the offices of the addressee(s). Upon completion of the facsimile transmission, a transmission report was issued showing the transmission was complete and without error.

(BY U.S. MAIL) I enclosed a true and correct copy of said document(s) in an envelope addressed to the addressee(s) listed above and placed it for collection and mailing following the ordinary business practices of Kirkpatrick & Lockhart Preston Gates Ellis LLP. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service with postage fully prepaid at San Francisco, California.

Executed on August 18, 2008 at San Francisco, California.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Mae A. Chu
Mae A. Chu

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